IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

CHARLES GREEN,	
Plaintiff,	Cara Na
v.	Case No.:
SOUTHWEST CREDIT SYSTEMS, L.P.,	
Defendant/	
IN THE DISTRICT COUR FOR HARFORD	
CHARLES GREEN,	
Plaintiff,	
v.	Case No.: 0901000018842016
SOUTHWEST CREDIT SYSTEMS, L.P.,	
Defendant.	

DEFENDANT'S NOTICE AND PETITION FOR REMOVAL

TO: The Honorable Judges of the United States District Court for the District of Maryland.

COME NOW, Defendant and Petitioner for removal, Southwest Credit Systems, L.P. ("Defendant"), and with reservation of all rights, hereby remove from the District Court of Maryland for Harford County, the proceeding entitled and captioned: *Charles Green v. Southwest Credit Systems, L.P.*, Case No.: 0901000018842016, on the basis of federal question jurisdiction.

The Petition is based on the following grounds:

- 1. Defendant/Petitioner, has been named as Defendant in a civil action brought against them in the District Court of Maryland for Harford County, the proceeding entitled and captioned: <u>Charles Green v. Southwest Credit Systems, L.P.</u>, Case No.: 0901000018842016. A copy of the Statement of Claim served in that action, in addition to all process and pleadings served upon Defendant/Petitioner, is attached hereto as Composite Exhibit "A".
- 2. The aforesaid action was commenced by service of process consisting of the Summons and Complaint, upon Defendant, on June 6, 2016.
- 3. The controversy herein between the Plaintiff and Defendant, is a controversy based upon consumer protection right created by and enforced through federal statutes, 15 U.S.C. § 1681, *et seq.*, entitled the Fair Credit Reporting Act.
- 4. The above-described action is a civil action over which this Court has original jurisdiction under the provisions of 28 U.S.C. § 1331, and is one that may be removed to this Court by the Defendants/Petitioners pursuant to the provisions of 28 U.S.C. § 1441(a), in that it is a civil action based upon a federal question over which this Court has original jurisdiction.
- 5. This Petition for Removal is filed with this Court within thirty (30) days after service on Defendant of the Statement of Claim in the above-styled action and is, therefore, timely pursuant to 28 U.S.C. § 1446 (b).

WHEREFORE Defendants respectfully request that the above entitled action be removed from the District Court Maryland in and for Harford County, Maryland, to the United States District Court for the District of Maryland for all further proceedings.

Respectfully submitted by:

/s/Jeffrey Friedman

Jeffrey Friedman 100 Owings Court, Suite 4 Reisterstown, MD 21136 (410) 526-4500 jeff@friedmanlaw.net Counsel for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail this 21^{st} day of June, 2016, to:

Charles Green – *PRO SE* 1217 Brice Square Balcamp, Maryland 21017 Cangreen74@ymail.com

/s/Jeffre	y Friedman